UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK DOVER LIMITED, 08 CV 1337 (LTS)(JCF) Plaintiff, -against-JOINDER OF DEFENDANTS DELBERT D. REICHARDT, ALAIN ASSEMI, HARTSFIELD CAPITAL JOHN H. BANZAF and SECURITIES, INC., HARTSFIELD CAPITAL HARSFIELD CAPITAL GROUP, STEPHEN J. LOVETT, SECURITIES, INC. TO JOHN H. BANZAF, DELBERT D. REICHARDT, : **MOTION TO DISMISS** MANSELL CAPITAL PARTNERS, LLC, FILED BY DEFENDANTS THOMAS O. BEGLEY & ASSOCIATES. THOMAS O. BEGLEY, TJ MORROW and TJ MORROW PC. THOMAS O. BEGLEY & ASSOCIATES. STEPHEN J. LOVETT and Defendants. HARTSFIELD CAPITAL GROUP

- 1. Defendants Delbert D. Reichardt, John H. Banzaf and Hartsfield Capital Securities, Inc. ("HCS Defendants") join in the motion to dismiss or, in the alternative, for a change of venue to the Northern District of Georgia filed with this Court on June 13, 2008 by co-defendants Thomas O. Begley, Thomas O. Begley & Associates, Stephen J. Lovett and Hartsfield Capital Group (the "HCG Defendants").
- 2. The HCS Defendants submit for the Court's consideration affidavits from Delbert D. Reichardt and John H. Banzaf, both dated June 17, 2008, annexed hereto as exhibits A and B, respectively, in further support of the HCG Defendants' pending motion to dismiss the complaint or change the venue of this action to the Northern District of Georgia.
- 3. The HCS Defendants respectfully request that this Court dismiss the complaint filed by the Plaintiff in this action, or, in the alternative, transfer this action to

the District Court of the Northern District of Georgia for the same reasons set forth in the June 13, 2008 motion, and the accompanying memorandum of law, filed by the HCG Defendants in this action.

Dated: New York, New York June 19, 2008

EISENBERG TANCHUM & LEVY Attorneys for Defendants Delbert D. Reichardt, John H. Banzaf and Hartsfield Securities, Inc.

Bv:

Stewart L. Levy (SL-2892) 675 Third Avenue, Suite 2900 New York, New York 10017

New York, New York 10017

(212) 599-0777 SLevy@etllaw.com